

**U.S. DISTRICT COURT  
DISTRICT OF NEW JERSEY**

SYDNEY TYSON, M.D.,

Plaintiff,

v.

JOHN/JANE DOE 1 aka "PAUL  
REED", COINBASE GLOBAL, INC.,  
and JOHN/JANE DOES 2-10,

Defendants.

Civil Action No. 1:23-cv-22066

**DECLARATION OF SYDNEY TYSON  
IN SUPPORT OF PLAINTIFF'S  
MOTION FOR  
EXPEDITED DISCOVERY**

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*Attorneys for Plaintiff Sidney Tyson*

Dated: Nov. 15, 2023

I, SYDNEY TYSON, Plaintiff in the above captioned matter, hereby declare as follows:

1. I am a resident of Sewell Township in Gloucester County, New Jersey and over eighteen (18) years of age. Accordingly, I am fully familiar with the matter herein.

2. I make this declaration in support of my motion for expedited discovery.

3. On or about July 18, 2023, I came to learn that an unknown individual or individuals, John/Jane Does 1 through 10, had unlawfully and without my permission accessed an online account I maintain at Coinbase Global, Inc., d/b/a Coinbase, in which I had cryptocurrency amounting to over \$250,000 USD at the time.

4. The perpetrators managed to convert all of the cryptocurrency in my account into Bitcoin, then transferred 9.94694294 BTC (worth approximately \$298,000 at the time) to other accounts presumably owned by this individual or individuals. *See Exhibit A, Coinbase email of July 23, 2023 1:02 am, attached hereto.*

5. The perpetrator(s) was able to do this despite the fact that I made sure to set up two factor authentication on my Coinbase account, which is designed to require verification by the owner using his or her cell phone or other personal device before he or she is given access.

6. Coinbase reported that the cryptocurrency was transferred in two transactions to an external account bearing the following identification number, known as a “hash”:

**bc1qdhxrng6sm03wgl9g 4n8rhec9f3ppqv72qv4g**

7. My counsel has retained the services of a forensic examiner, Coinfirm, to track the cryptocurrency. Coinfirm has confirmed that John/Jane Does 1 through 10 next transferred the cryptocurrency through a number of accounts (known as “layering”) to obscure rightful ownership. *See Exhibit B, Coinfirm Report Nov. 8, 2023, attached hereto, at p. 7.*

8. Coinfirm traced the movement of my cryptocurrency ultimately to several

accounts, known as digital or virtual “wallets”, at various other cryptocurrency exchanges. See Exhibit B, at pp. 5-6.

9. These cryptocurrency exchanges are required to maintain careful, detailed “know your customer” (KYC) records for purposes of anti-money laundering (AML) and combating the financing of terrorism (CFT). The KYC records maintained by these exchanges might prove helpful in determining the identities of John/Jane Does 1 through 10 and may ultimately assist in the recovery of my digital assets.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

11 / 15 / 2023  
Dated:

By:   
SYDNEY TYSON



## Audit trail

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Document ID	b70acf316fbc62a8a46de9934fcc7f4e92d0e20c
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## Document History



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